

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

VS.

DANIEL BLUE

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DEFENDANT'S MOTION IN OPPOSITION TO GOVERNMENT'S MOTION TO  
PRECLUDE CROSS-EXAMINATION OF DETECTIVE ROBERT CLARK  
REGARDING PRIOR INSTANCES OF UNRELATED MISCONDUCT.

William R. Buie III, Esquire, of William R. Buie III, P.A. on behalf of Defendant Daniel Blue, motions this court in opposition to the government's motion captioned above for the following reasons:

(1) That Rule 608(b) allows said evidence since it goes to the witness' truthfulness or untruthfulness.

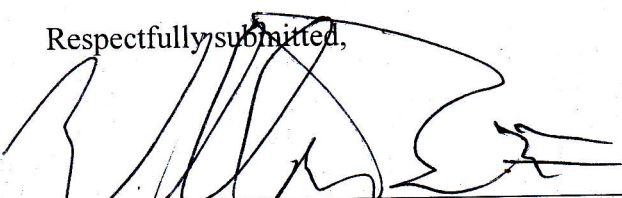
(2) That the sustained finding by the Baltimore Police Department clearly pertains to the witness's lack of truthfulness relating to his work in law enforcement..

(3) That, under Rule 608(b), the Court may at its discretion permit questioning about specific instances of conduct on cross-examination, but only if the conduct is probative of the witness' character for truthfulness or untruthfulness.

(4) That, the good-faith belief is established based on the police finding and no prejudice exists in disclosing said true information relating to the witness' untruthfulness at work.

(5) That Defendant, for all of the reasons noted above, requests that Detective Robert Clark be exposed to being cross-examined on the December 19, 2019, sustained misconduct finding by the Baltimore City Police Department.

Respectfully submitted,

  
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Attorney for the Defendant

REQUEST FOR A HEARING

Pursuant to Rule 105-6 of the Local Rules of the United States District Court for the District of Maryland, a hearing is requested on the defendant's motion.

  
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WILLIAM R. BUIE III, ESQUIRE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY 30<sup>th</sup> day of April 2021 a copy of the Defendant's Motion to be Released on Electronic Monitoring was electronically mailed to the LaRai Everett, Assistant United States Attorney for the District of Maryland, 36 South Charles Street, 4<sup>th</sup> Floor, Baltimore, Maryland 21201.

  
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WILLIAM R. BUIE III, ESQUIRE